DEBATES AS AIDS IN INTERPRETING STATUTES. — An interesting question is often raised as to how far courts, in construing statutes, may look into the motives and intentions of the individual legislators. By the general weight of authority the court cannot look into the debates on the statute in question, as this shows merely the intention and interpretation of the individual members of the legislature, which may not of course represent the true object of the majority. *Aldridge* v. *Williams*, 3 How. 24. This doctrine has been rejected by the New York Court of Appeals in a recent decision, holding that the court may look into the published records of the debates preceding the passage of the act. *People* v. *Dalton*, New York Law Journal, March 7, 1899.

Such evidence is unquestionably very slight, and possibly misleading, but neither of these objections seems sufficient to exclude it altogether. It would never be referred to except in obscure cases, and even then it would hardly be misleading to the court, trained as they must be in considering and weighing evidence. In adopting the contrary doctrine, courts may have been influenced by that legitimate rule of evidence which excludes declarations of intention of the parties in construing written documents. But this does not rest on the supposition that such evidence of the actual intention and understanding of the parties is not extremely valuable as an aid to interpretation, but on the ground that it is untrustworthy, and likely to be the subject of misrepresentation and perjury. This objection, however, cannot be urged in the principal case. Recitals in statutes, and records of bills presented or finally passed in either house have always been referred to by the courts, yet they differ from the debates only in that they are more likely to represent the view of the majority. *Blake* v. *National Banks*, 23 Wall. 307. Curiously enough, in construing the State constitutions, it has always been held allowable to refer to the debates in the constitutional conventions, yet there seems to be no reason for this distinction. *People* v. *Harding*, 53 Mich. 481.

The only valid objection to such evidence lies in its slight weight. But this in itself seems insufficient to warrant any fixed rule of exclusion. Such rules were made for the benefit of the jury, an untrained body of men, likely to be misled by such evidence, — a reason which does not apply to the court. And the principal case seems to lay down the more sensible and better doctrine, that the court may look into all the evidence it can find, trusting to its own prudence and experience not to be unduly influenced.

THE TACKING OF ADVERSE HOLDINGS. — The question, whether successive adverse holders may fulfil the statutory requirement of twenty years' adverse possession by tacking their periods of occupancy to divest the land owner of his title, has been passed on by the Supreme Court of Massachusetts. In *Frost* v. *Courtis*, 52 N. E. Rep. 515 (Mass.), the respondent, having been in possession of the disputed land under a void devise, conveyed by deed to one Morse. The court, following *Sawyer* v. *Kendall*, 10 Cush. 241, declared that, if the combined periods of possession of the respondent and Morse equalled twenty years, the true owner was deprived of his title. In *Sawyer* v. *Kendall*, *supra*, the wife of the plaintiff's disseisor endeavored to tack her husband's possession to her own in order to satisfy the statute. But it was ruled that where there was no privity of estate between successive wrongful holders, the privilege of tacking would not be allowed. In the principal case sufficient privity